

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

LIDIA JENKINS

Plaintiff,

vs.

RAY D. BOND and ELISABETH M. BOND,
husband and wife; and BOND
ENTERPRISES, INC., doing business as
OLYMPIC PHARMACY,

Defendants.

Cause No: C05-5126KLS

Defendant's Initial Disclosures Pursuant
to FRCP 26 (a) (1)

Pursuant to FRCP 26 (a) (1), the defendant, Olympic Pharmacy, provides the following
information to facilitate discovery and in compliance with the federal rules.

Witnesses:

The following individuals may have information the defendant would rely on in
establishing defenses to the plaintiff's claims:

Amber Lacheney: 1106 36th Ave Ct. NW Gig Harbor 98335 (253) 691-6520

Charmaine Williams: 5220 80th Ave NW Gig Harbor 98335 (253) 853-5024

DEFENDANT'S INITIAL DISCLOSURES
FRCP 26 (a) (1)

DAVIS GRIMM PAYNE & MARRA
701 Fifth Avenue, Suite 4040
Seattle, Washington 98104
(206) 447-0182

1 Jeannine Crowley: 911 23rd Ave NW Gig Harbor 98335 (253) 851-2302

2 Jennifer Goemant: 8201 38th St Ct W University Place WA. 98466 (253) 460-0163

3 Kaisha Squance: 4270 East St. Rte 302 Belfair WA. 98528 (360) 277-3792

4 *Mark Crowley

5 *Vince Pinaroc

6 * Ray Bond

7 * Marvin Scott

8 *Kreysoff Pawlowski

9 Chelsea Showalter: 3722 Picnic Point Ct. NW Gig Harbor 98335 Phone unknown

10 Catie McGee: Address and contact information unknown

11 Those employees listed above with an asterisk are management employees and can all be
12 contacted through defense counsel. Each witness has information about Ms. Jenkin's conduct
13 during her employment, violation of the employer's rules and expectations, her absences and
14 reasons for her absences and her product orders for personal use. Some of the witnesses have
15 information about her failure to report to work prior to her termination, her failure to disclose her
16 drug and alcohol treatment and the impact this may have had on the pharmacy technician's
17 licensing status.

18 Other potential witnesses include Ms. Jenkin's live in boyfriend, her ex-husband, her
19 drug and alcohol treatment counselor, her medical health care providers, however, their names
20 and contact information is currently unknown.

21 Documents:

22 The documents relevant to plaintiff's claims and the defenses raised in this action are not
23 fully known at this time. Documents known to the employer include Ms. Jenkins' personnel file,
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1 payroll and attendance records, the employer's payroll records for the period of two years prior
2 to Ms. Jenkins' termination, L&I reports listing numbers and hours worked for employees for the
3 two years prior to Ms. Jenkins' request for leave, the data compilation already provided to
4 plaintiff's counsel counting numbers of employees on the payroll for the year prior to Ms.
5 Jenkins' request for leave. These documents are all currently located at the defendant's place of
6 business.

7 Ms. Jenkins' medical history, full records of medical care and other medical testing, data,
8 lab and other reports are also relevant to this claim and are presumed to be in the place of
9 business of each such health care provider. The full extent of this information and it's location is
10 presently unknown.

11 There does not appear to be insurance coverage available for this claim.

12 The defendant does not contemplate calling experts unless as rebuttal experts.

13 DATED THIS 11th Day of MAY, 2005

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16 Eileen M. Lawrence, WSBA #11885
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21 Facsimile: (206) 622-9927
22 Email: elawrence@davisgrimmpayne.com

23 Attorneys for Defendants
24

CERTIFICATE OF SERVICE

This will certify that on May 12, 2005, a true and correct copy of the foregoing
"Defendant's Initial Disclosures Pursuant to FRCP 26(a)(1)" was duly served by facsimile and
first-class mail with postage prepaid as follows:

Attorney for Plaintiff:
Kathleen E. Pierce, WSBA #12631
Morton McGoldrick, P.S.
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P.O. Box 1533
Tacoma, WA 98401-1533
Facsimile: (253) 272-4338


Betsy Johnson, Legal Assistant